

Skilled Nursing Facilities Life Safety Surveys

Top Ten Deficiencies and How to Avoid
Them

Mark Grimes, Supervisor Facility Fire Safety & Construction
Program

SNF Top Ten - Objectives

- Recognize the most commonly cited Life Safety Code deficiencies and learn how to avoid being cited.
- Discuss the process of obtaining a waiver of Life Safety Code standards in certain health care settings.

SNF Top Ten

- #1 Sprinkler System Maintenance (K62)
(34.7%)
 - Quarterly Inspections (flow alarm test)
 - Five year obstruction investigation
 - Occasional annual inspection overdue
 - Painted Heads
 - Mixed Heads



Obstruction Investigation







SNF Top Ten

- #2 Sprinkler Installation (K56) 24%
- Incomplete coverage
 - Combustible Overhangs Greater than 4 Feet
 - Porte Cocheres – Loading Docks
 - Closets – Walk-in Coolers



SNF Top Ten

- #3 Hazardous Area Separation (K29) 21.3%
 - Self Closing Doors chocked, blocked or tied
 - Poor or no Self Closure devices
 - Newly created spaces

What is a Hazardous area?

- Soiled Linen/Trash rooms - Boiler/Fuel Fired Heating/Laundry/Repair Shops/Laboratories
- Storage rooms greater than 50 square feet w/ Combustibles

Hazardous Areas



Hazardous Areas



SNF Top Ten

- #4 Electrical Wiring & Equipment (K147) 20%
 - Relocatable Power Taps (Power Strips)
 - Multi-plug Adaptors & Extension Cords
 - Exposed Wiring – Cover Plates – Damaged Outlets
 - RPTs are approved for AV equipment, Computers and Peripherals, low loads only.
 - Not for extension cords, Frig, Micro, Coffee Makers and NEVER for patient care devices















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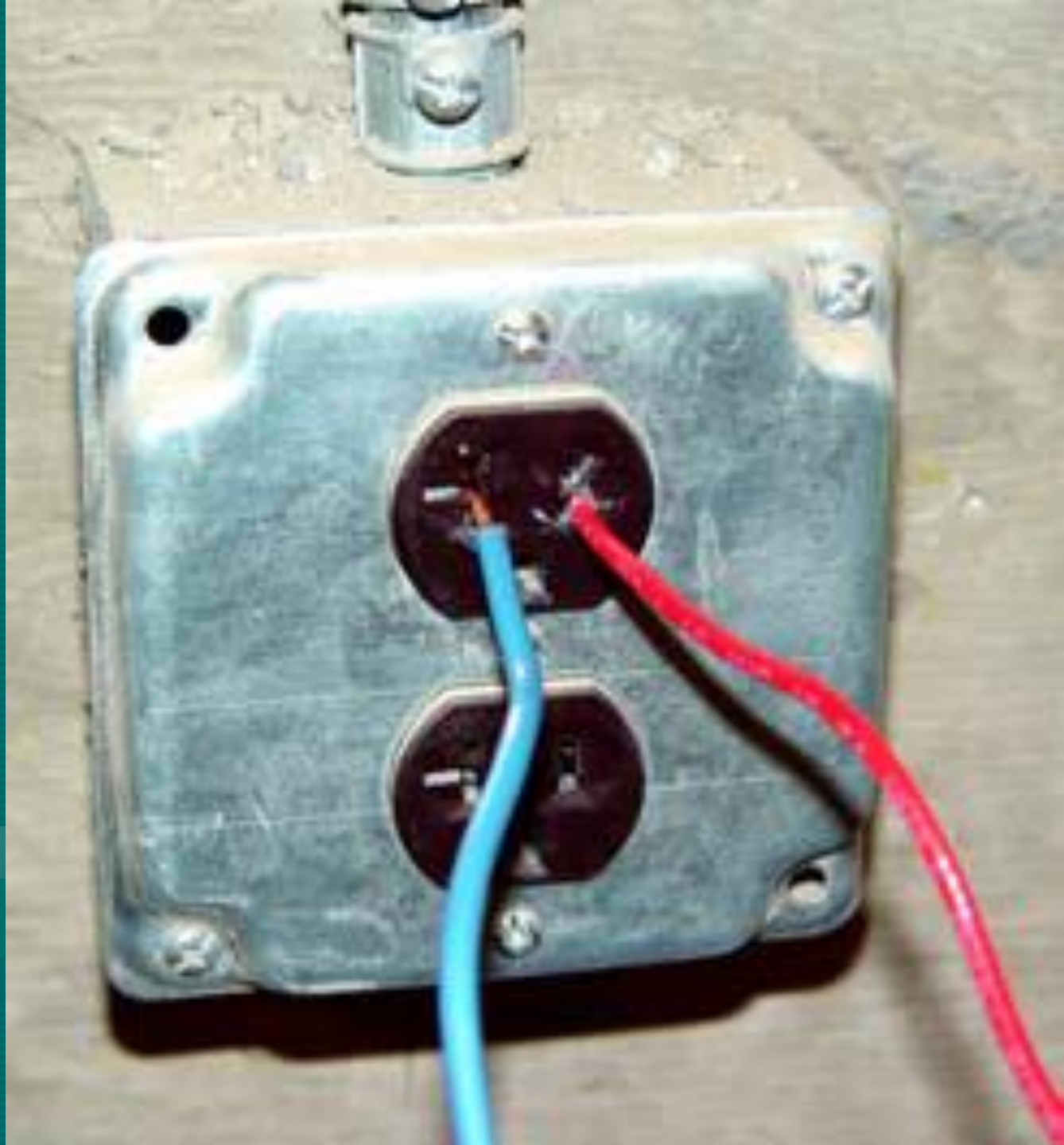
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SNF Top Ten

- #5 Corridor Doors (K18) 18.7%
 - Doors that protect corridor openings must prevent the passage of smoke
 - Do not latch
 - Gaps due to warping
 - Damaged hardware
 - Dutch Doors with out an astragal
 - Roller latches (rare)



SNF Top Ten

- #6 Generator Inspected/Tested (K144) 17.3%
 - Weekly Inspections
 - Monthly Testing under Load 30 minutes
 - Not Testing ATS
 - Monthly = 12 times per year with 20-40 day intervals

SNF Top Ten

- #7 Emergency Lighting (K46)
14.7%
 - Monthly Testing (30 seconds)
 - Annual Testing (90 Minutes)
 - No Documentation
 - Failed to Operate (bulbs/battery)



SNF Top Ten

- #8 Oxygen Transfer Requirements (K143)
14.7%
 - Area used does not meet design requirements
 - 1 Hour – Sprinklered – Self Closing- Mechanical Ventilation- Not Separated from Patient Care- Sign
 - Signage
 - Fan inoperable
 - Door stops
 - Combustible storage

LOX Hazards



- Oxygen Rich Atmosphere
- Increased Flammability of Ordinary Combustibles
- LOX + Hydrocarbons = KABOOM
- Spills = Cryogenic Burns

SNF Top Ten

- #9 Exit Access (K38) 13.3%
 - Blocked Exits or Exit Access
 - Storage in Stairwells
 - Non-continuous Exit Discharge to Public Way
 - Locks
 - Mirrors / Camouflage
- Can Rise to Immediate Jeopardy Level











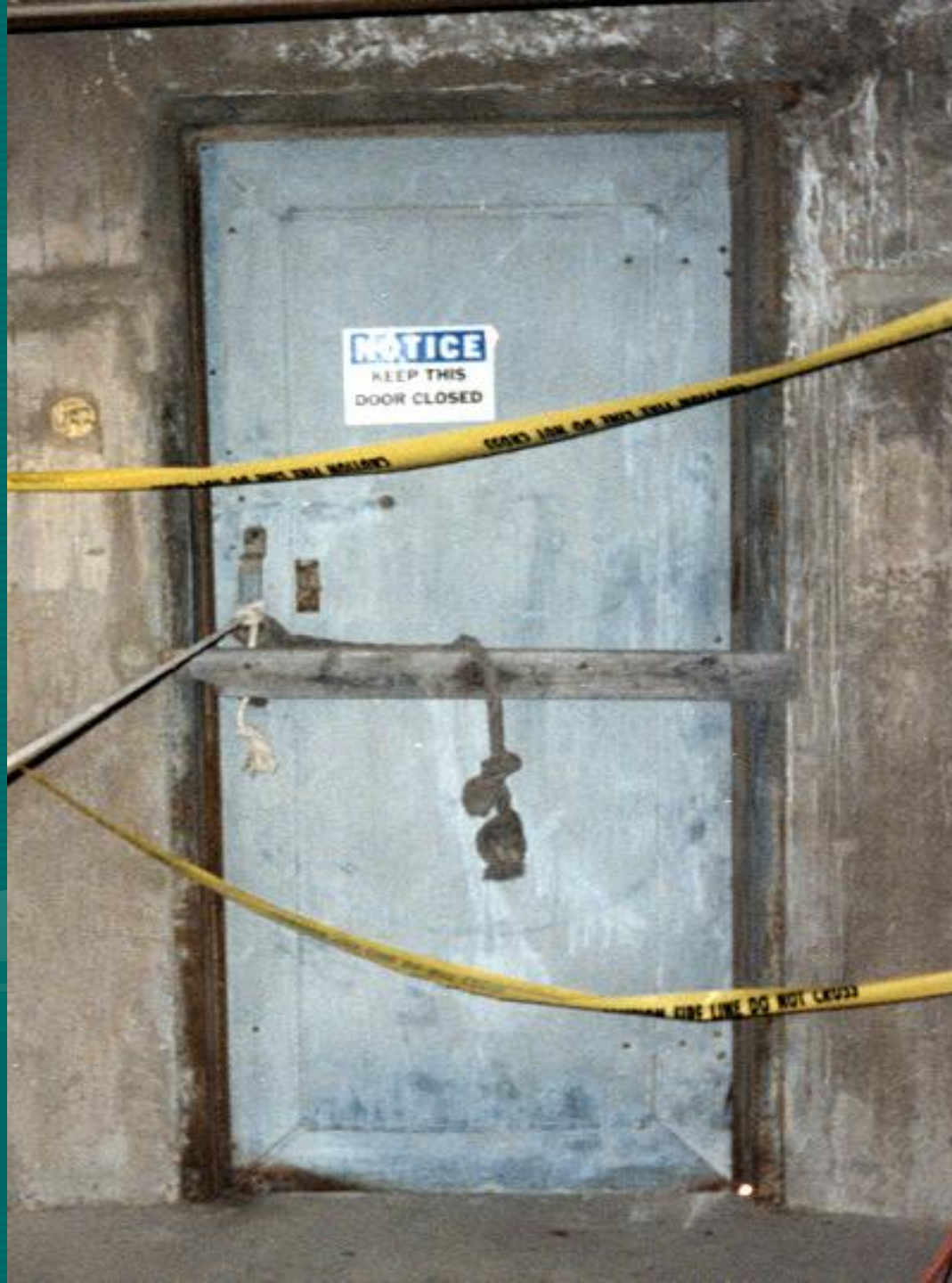




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SNF Top Ten

- #10 Cooking Equipment (K69) 9.3%
- Exhaust Hood
 - Inspection Every Six Months Clean as Necessary
 - Wrong Filters or Orientation
 - Documentation of the Last Two Inspections
- Hood Suppression System
 - Serviced Every Six Months
 - Auto Fuel Shutoff Interconnect
 - K-Extinguisher & Signage
- Improper Hood Coverage













How To Avoid Deficiencies

- Conduct the required inspections/testing/maintenance/or other activity at the scheduled interval
 - Daily-Weekly-Monthly-Quarterly-Twice Annual-Annual- Multi-Year
 - Document the activity.... If it isn't recorded, it didn't happen
 - Have your documentation organized - Three Ring Binder Works well

How to Avoid Deficiencies

SimplexGrinnell BE SAFE.

CODE REQUIREMENTS FOR VISUAL INSPECTIONS

SimplexGrinnell BE SAFE.

CODE REQUIREMENTS FOR FUNCTIONAL TESTING

- Forms –Checklist- Memory sheets- Calendars- Software – whatever works for you.

How To Avoid Deficiencies

- Label the records – leave them out where they can be found easily by surveyor
- Daily Rounds
 - Fix as you go
 - Notebook
 - Work order system
- Read the report details, follow-up on deficiencies identified by contractors
 - Track corrective action with the original report

How To Avoid Deficiencies

- Get staff to buy into safety
 - Explain the reasoning
 - Reward good behaviors - chocolate is good/K-tags are bad - safety awards – a simple pat on the back and thank you
- Safety before convenience

Waivers

- Extension Waivers
 - Construction – Bidding - Design and Approval
 - Formal Letter Signed by the Administrator Requesting a Waiver
 - What – Why - How you will Protect Residents – Firm Correction Date
 - State Agency Recommends or Does Not Recommend
 - Regional Office Approves or Denies

Waivers

- Waivers Based on FSES
 - Must Request FSES Before we Exit
 - Third Party Engineer or Architect
 - Must Pass with a Positive Score
 - Good for One Year
- No Waivers for Sprinkler Deficiencies after August 2013

Waivers

- CMS Survey & Certification Letter of March 9, 2012 for waivers of the 2000 LSC requirements
- Allows use of 2012 LSC requirements in four specific areas only
 - Capacity of Means of Egress
 - Cooking Facilities
 - Fireplaces in Smoke Compartments Containing Sleeping Rooms
 - Combustible Decorations on Walls and Doors

Waivers

- Projections into the Corridor Width
 - All Conditions Must be Met
 - Furniture Attached to Wall or Floor
 - One Side Only
 - Limited to 8' Corridors
 - No Less than 72 inches (6') Clear Width
 - Grouping of 50 Square Feet (2' x 25')
 - Separated by 10 Feet
 - Does Not Obstruct Service and Fire Protection Equipment (med gas – fire extinguishers – etc)

Waivers

- For Wheeled Equipment in the Corridor
 - All Conditions Must be Met
 - Does Not Reduce Clear Width to Less than 60 Inches
 - Fire Safety Plan Addresses Relocation in an Emergency
 - Training is Provided and Documented
 - Wheeled Equipment is Limited to:
 - Patient Lift and Transport Equipment
 - Crash Carts/Infection Control Carts
 - Carts in Use – food – meds – housekeeping – etc

Waivers

- Residential Cooking Facilities Open to Corridor
- Less Than 30 Residents in Smoke Compartment
- Hood & Suppression System UL300 or 300A
- Deep Frying / Solid Fuel Prohibited
- Locked –Time out- Control of Cooktop
- Special Detection Requirements
- Only Complete Signed/Stamped Plans Accepted
Due to Complexity

Waivers

- Fireplaces
- Chimney Connected
- Combustion Air From Outside
- Combustion System Separated from Occupied Atmosphere
- Auto-Shutdown
- Only Complete Signed/Stamped Plans Accepted Due to Complexity

Waivers

- Combustible Decorations
- Sprinklered Smoke Compartment
- Attached to Walls, Ceiling or Non Rated Doors
- Do Not Interfere with Doors
- 30% of Surface Area in Room/Spaces in Smoke Compartment
- 50% of Surface Area Inside Sleeping Room
- Treated/Listed/Tested –No Limit

SNF Top Ten – Review the Objectives

- Recognize the most commonly cited Life Safety Code deficiencies and learn how to avoid being cited.
- Discuss the process of obtaining a waiver of Life Safety Code standards in certain health care settings.

SNF Top Ten

- Questions?

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